

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al.,
individually and on behalf
of others similarly situated,

Plaintiffs,

No.
3:18-cv-01477-JR

v.

NIKE INC., an Oregon
Corporation,

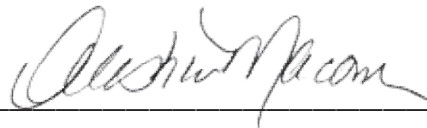
Defendant.

REMOTE VIDEOCONFERENCE 30(b)(6) DEPOSITION OF
SHELLI WHITE
Taken in behalf of Plaintiffs
January 29, 2021

C E R T I F I C A T E

I, Aleshia K. Macom, Oregon CSR No. 94-0296, Washington CCR No. 2095, California CSR No. 7955, RMR, CRR, RPR, do hereby certify that SHELLI WHITE remotely appeared before me at the time and place mentioned in the caption herein; that the witness was by me first duly sworn on oath, and examined upon oral interrogatories propounded by counsel; that said examination, together with the testimony of said witness, was taken down by me in stenotype and thereafter reduced to typewriting; and that the foregoing transcript, pages 1 to 235, both inclusive, constitutes a full, true and accurate record of said examination of and testimony given by said witness, and of all other proceedings had during the taking of said deposition, and of the whole thereof, to the best of my ability.

Witness my hand at Portland, Oregon, this 11th day of February, 2021.



Aleshia K. Macom

OR CSR No. 94-0296, Expires 9-30-2023

WA CCR No. 2095, Expires 7-7-2021

CA CSR No. 7955, Expires 7-7-2021

Cahill, et al v. Nike**Shelli White Deposition Errata**

Page: Line	Reads	Should Read	Reason
12:23	"Yes. Approximately June 2020."	"Yes. Approximately June 2019."	To conform to the facts
97:4	"I don't know."	"I don't know, other than the names I have already provided."	To reflect prior consistent testimony mischaracterized by counsel
101:6	"Then I don't know."	"Then I don't know, other than the names I have already provided."	To reflect prior consistent testimony mischaracterized by counsel
128:14	"The higher the range, the higher the guideline."	"The higher the rating, the higher the guideline."	To correct a transcription error

I attest that the above-referenced changes are true and correct.

Date: March 22, 2021

DocuSigned by:

Shelli White

F8DEB74ECF524EA...

Shelli White

Byron Goldstein

From: Davis, Felicia A. <feliciadavis@paulhastings.com>
Sent: Thursday, January 21, 2021 1:58 PM
To: Barry Goldstein; Byron Goldstein; James Kan; Mengfei Sun
Cc: Prince, Daniel; Zabele, Laura
Subject: Cahill - Topics for January 29, 2021 Rule 30(b)(6) deposition



Counsel,

Subject to our objections, here is the list of topics for the Rule 30(b)(6) deposition on January 29, 2021:

- **Topic 5:** HQ executives' involvement, knowledge and responsibilities related to Performance Sharing Plan ("PSP") and Long Term Incentive Plan ("LTIP"); Executives knowledge regarding potential disparities between men and women in PSP and Equity/LTIP; Executives' involvement, knowledge, and responsibilities concerning the formation, review, or changing of policies and practices related to PSP and Equity/LTIP (2015 – present).
- **Topic 8:** Effect of performance evaluations and potential appraisals on PSP and Equity/LTIP (2015 – present).
- **Topic 12:** Calculations, factors, recommendations, supervision, responsibilities, authority, and determinations concerning the amount of, factors impacting, and eligibility for PSP payments for employees in Covered Positions; Related policies and practices; Who formed, reviewed, or changed such policies and practices, and how these policies and practices were formed, reviewed, or changed (2015 – present).
- **Topic 14:** Equity and LTIP awards, including eligibility, calculations, factors, recommendations, supervision, responsibilities, authority, and determinations; Related policies and practices; Who made recommendations and determinations regarding awards of equity or LTIP; Who formed, reviewed, or changed such policies and practices, and how these policies and practices were formed, reviewed, or changed (2015 – present).
- **Topic 16:** Compensation at promotion or lateral job transfer as it relates to PSP and Equity/LTIP (2015 – present).

Thanks,
Felicia



Felicia A. Davis | Partner, Employment Law Department

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